

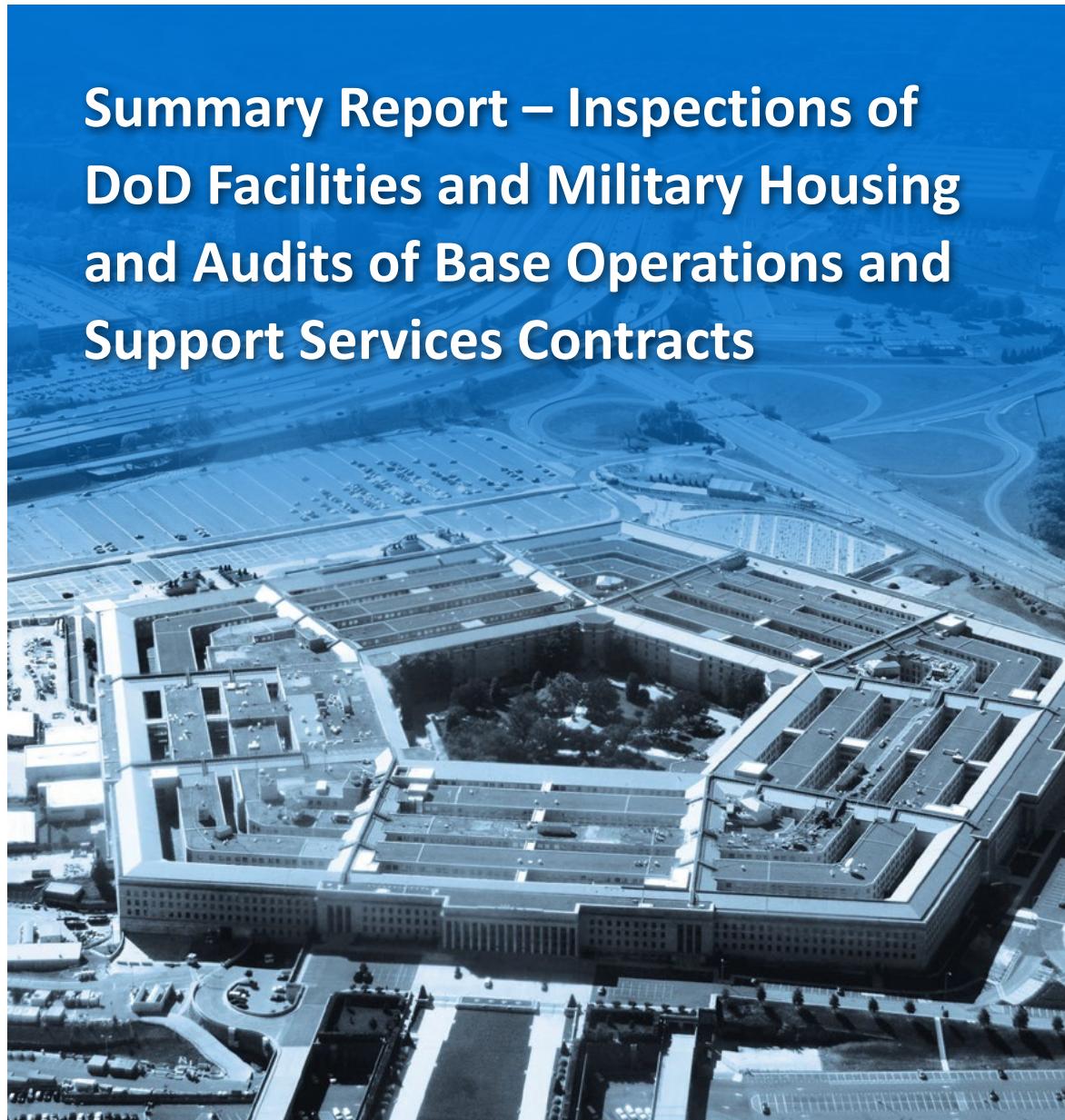


INSPECTOR GENERAL

U.S. Department of Defense

OCTOBER 14, 2016

Summary Report – Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts



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Results in Brief

Summary Report – Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts

October 14, 2016

Objective

In this report, we summarize and analyze previous DoD Office of Inspector General (DoD OIG) health and safety inspections of DoD-occupied facilities and military housing. We also reviewed audit reports related to Base Operations and Support Services (BOSS) contracts and facilities maintenance. Our objective was to identify common issues and broader findings.

Additionally, we evaluated DoD policy and guidance regarding health and safety requirements for DoD-occupied facilities to determine whether any gaps or conflicts in coverage existed.

Findings

The DoD OIG issued six reports from July 2013 to July 2016 related to health and safety inspections of DoD facilities at various locations around the world, documenting 3,783 deficiencies in electrical system safety, fire protection systems, and environmental health and safety. During these inspections, the DoD OIG issued 12 notices of concern (NOCs), detailing 319 critical deficiencies requiring immediate action at 24 of the 36 installations inspected. The six inspection reports identified significant health and safety deficiencies and systemic weaknesses in inspections and maintenance. We found that the average number of deficiencies per building was consistent regardless of location. For instance, we found an average of two to three electrical and fire protection deficiencies for each building inspected, and about one environmental health and

Findings (cont'd)

safety deficiency for every two buildings inspected. The pervasiveness of electrical system safety, fire protection, and environmental health and safety deficiencies was the most significant trend that we observed.

Deficiencies in electrical system safety, fire protection systems, and environmental health and safety were pervasive because of a lack of adequate preventative maintenance and inspections being performed at the installations. As a result, DoD personnel and military families were exposed to health and safety hazards at installations around the world. DoD policy and guidance requires periodic inspections of DoD facilities. However, none of these inspections comprehensively examine the effectiveness of facility sustainment processes with respect to the overall health and safety of occupants. In addition to the Military Departments taking action to improve inspections and maintenance in response to the previous reports, we recommend that the Military Departments undertake independent verification efforts to ensure the programs are effective.

In addition, the DoD OIG issued eight audit reports from June 2011 through March 2016 related to BOSS contracts and facilities maintenance, worth about \$1.8 billion, in the U.S. Central and U.S. Africa Command areas of responsibility. The DoD uses BOSS contracts to provide facilities maintenance and other life support functions. The eight audit reports identified two systemic contracting and oversight problem areas. First, the audit reports identified problems with contract documentation and requirements. Second, the reports identified contract oversight problems, such as the DoD not holding contractors accountable for poor performance while constructing and maintaining facilities. These systemic problems resulted in increased health and safety risks to service members. The poor contract documentation and oversight also did not ensure that the DoD received the best value for its money spent on these contracts.

Since 2010, the DoD has been improving its policy and guidance on health and safety to strengthen requirements. The improvements include publications that establish safety and habitability requirements for facilities used in support



Results in Brief

Summary Report – Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts

Findings (cont'd)

of military operations, environmental policy for contingency locations, and two memorandums issued by the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD(AT&L)) establishing standardized facility inspections and priorities for reinvesting in facilities sustainment. We did not identify any gaps or conflicts in coverage in policies and guidance establishing health and safety requirements for DoD facilities.

However, the USD(AT&L) had not yet incorporated the two memorandums that implement standardized facility inspections and prioritize the reinvestment in facilities sustainment into permanent policy.

Recommendations

We recommend that the Secretaries of the Military Departments annually perform at least two comprehensive, independent inspections of installations to verify compliance with applicable health and safety requirements and to aid the DoD in improving facility sustainment worldwide.

We recommend that the USD(AT&L):

- Establish a joint-Service working group to identify and implement improvements in facility inspection and maintenance programs.
- Develop standard procedures or templates for services performed under BOSS contracts in contingency environments to assist the DoD in the development and oversight of those contracts, including:
 - identifying applicable Federal and DoD regulations, minimum requirements for performance work statements and quality assurance surveillance plans, and minimum training for personnel overseeing BOSS contracts; and

Recommendations (cont'd)

- developing minimum requirements for a comprehensive risk assessment for each service performed under BOSS contracts and a mechanism to recover funds for services not completed.
- Establish permanent policy for the sustainment of facilities, including standardized facility inspections. The policy should incorporate the requirements set forth in the September 10, 2013, "Standardizing Facility Condition Assessments," and April 29, 2014, "Facility Sustainment and Recapitalization Policy," memorandums.

Management Comments and Our Response

Comments from officials at the Departments of the Army and Navy addressed the specifics of the recommendations, and no further comments are required.

Comments from the Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment, responding for USD(AT&L), and the Air Force partially addressed the specifics of the recommendations; therefore, we request further comments detailing actions and completion dates.

The Principal Deputy also disagreed with the recommendation to develop requirements for risk assessments. Although the Military Departments are responsible for individual BOSS contracts, we believe the multiple examples identified in this report demonstrate a systemic issue that should be addressed at a higher level. Please see the Recommendations Table on the following page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Secretary of the Army		A.1
Secretary of the Navy		A.1
Secretary of the Air Force	A.1	
Under Secretary of Defense for Acquisition, Technology, and Logistics	A.2, B.1.a-c	C
Commander, Army Contracting Command–Rock Island		B.2.a-b

Please provide Management Comments by November 21, 2016.





**INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500**

October 14, 2016

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION,
TECHNOLOGY, AND LOGISTICS
ASSISTANT SECRETARY OF THE AIR FORCE
(FINANCIAL MANAGEMENT AND COMPTROLLER)
INSPECTOR GENERAL, DEPARTMENT OF THE ARMY
NAVAL INSPECTOR GENERAL
AUDITOR GENERAL, DEPARTMENT OF THE ARMY

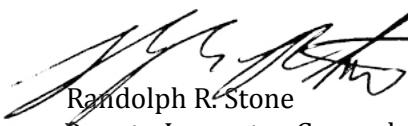
SUBJECT: Summary Report – Inspections of DoD Facilities and Military Housing and Audits
of Base Operations and Support Services Contracts (Report No. DODIG-2017-004)

We are providing this report for review and comment. We analyzed previous DoD Office of Inspector General (DoD OIG) health and safety inspections of DoD-occupied facilities and military housing. We also reviewed audit reports related to Base Operations and Support Services (BOSS) contracts and facilities maintenance. Our objective was to identify common issues and broader findings. Additionally, we evaluated policy and guidance regarding health and safety requirements for DoD-occupied facilities. We conducted this evaluation in accordance with the "Quality Standards for Inspection and Evaluation," published in January 2012 by the Council of the Inspectors General on Integrity and Efficiency.

We considered comments on a draft of this report. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Comments from officials at the Departments of the Army and Navy addressed the specifics of Recommendations A.1 and B.2.a-b, and no further comments are required. However, the Air Force only partially addressed the specifics of Recommendation A.1, and further comments are required from the Secretary of the Air Force. Additionally, officials at the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics, responding for the Under Secretary, addressed the specifics of Recommendation C, but only partially addressed the specifics of Recommendations A.2 and B.1.a-c. Therefore, we request further comments from the Secretary of the Air Force and the Under Secretary of Defense for Acquisition, Technology, and Logistics on the recommendations by November 21, 2016. Please describe what actions you have taken or plan to take to accomplish the recommendations and include the actual or planned completion dates of your actions.

Copies of your comments must have the actual signature of the authorizing official for your organization. We cannot accept the /Signed/ symbol in place of the actual signature.




Randolph R. Stone
Deputy Inspector General
Policy and Oversight

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Introduction

Objective

We analyzed previous DoD Office of Inspector General (DoD OIG) health and safety inspections of DoD-occupied facilities and military housing. We also reviewed audit reports related to Base Operations and Support Services (BOSS) contracts and facilities maintenance. Our objective was to identify common issues and broader findings.

Additionally, we evaluated DoD policy and guidance regarding health and safety requirements for DoD-occupied facilities to determine if any gaps or conflicts in coverage existed. See Appendix A for our scope and methodology.

Background

According to the “Base Structure Report – Fiscal Year 2015 Baseline,” the DoD is one of the Federal Government’s largest holders of real estate, managing a global real property portfolio that consists of nearly 562,000 facilities, including about 280,000 buildings located at more than 4,800 sites worldwide and covering more than 24.9 million acres. The DoD’s real estate property portfolio spans all 50 states, 7 U.S. territories with outlying areas, and 42 foreign countries. The majority of the foreign sites are located in Germany (181 sites), Japan (122 sites), and South Korea (83 sites). The approximate value of the portfolio was about \$880 billion at the end of FY 2015.

Between 2003 and 2008, 18 U.S. military and contractor personnel electrocution fatalities occurred in Iraq. In response, the DoD OIG issued Report Nos. IE-2009-006, “Review of Electrocution Deaths in Iraq: Part I – Electrocution of Staff Sergeant Ryan D. Maseth, U.S. Army,” July 24, 2009, and IPO2009E001, “Review of Electrocution Deaths in Iraq: Part II – Seventeen Incidents Apart from Staff Sergeant Ryan D. Maseth, U.S. Army,” July 24, 2009. In these reports, the DoD OIG determined that several of the fatalities were a result of contact with improperly grounded and faulty equipment. Facilities occupied in Iraq by U.S. military and civilian personnel contained substandard equipment, improperly grounded and bonded wiring, and overloaded circuits. As reported by the Army Combat Readiness Center and discussed in DoD OIG Report No. IE-2009-006, standards for electrical systems and fire safety generally did not exist for facilities in Iraq. Furthermore, since occupation by U.S. personnel in May 2004, facilities had not undergone significant improvements to increase the safety to acceptable levels, and electrical systems were maintained “as is,” perpetuating major electrocution hazards.

Previous Health and Safety Inspections

As a result of the findings in Iraq, the DoD OIG performed health and safety inspections of military housing and other DoD-occupied facilities¹ at various locations around the world, including Afghanistan, Japan, Republic of Korea, the National Capital Region (NCR), the Southeastern region of the United States, and Jordan.² As of July 2016, the DoD OIG has completed six reports that detailed inspections at 36 installations. The scope of these inspections included the onsite examination of facilities to identify issues related to electrical system safety, fire protection, and environmental health and safety. DoD OIG environmental health and safety inspections focused on identifying environmental hazards that members of the armed forces and their dependents may be exposed to while living and working on military installations. These hazards were asbestos, lead-based paint, drinking water quality, radon, pest management, mold, and radiation. In addition, during the Japan and Korea inspections, we evaluated the management of military housing, including the examination of work orders and program management plans.

Criteria for these inspections included Federal and DoD health and safety policies and standards, Unified Facilities Criteria (UFC),³ consensus standards, and local standard operating procedures, as applicable. Consensus standards consisted of nationally recognized building codes, fire and life safety codes, and electrical codes, including those created by the American Society of Civil Engineers, International Code Council, and the National Fire Protection Association. See Appendix B for more information about prior coverage.

The DoD OIG continues to perform similar inspections, such as an inspection conducted in Kuwait in 2016,⁴ but these are not discussed in this report because they are ongoing.

Previous Audits of BOSS Contracts and Facilities Maintenance

The DoD OIG conducted eight audits related to BOSS contracts⁵ and facilities maintenance in the U.S. Central and U.S. Africa Command areas of responsibility that included installations in Afghanistan, Jordan, Qatar, Kuwait, and Djibouti.⁶ The objective of these audits was to determine whether the DoD properly managed and administered the contracts supporting base operations of military facilities at these locations in accordance with Federal and DoD policies.

¹ Other facilities inspected included hospital and medical clinic buildings, aircraft hangars, gym facilities, detention buildings in Afghanistan, and special operations training center facilities in Jordan.

² Report Nos. DODIG-2013-099, DODIG-2014-121, DODIG-2015-013, DODIG-2015-162, DODIG-2015-181, and DODIG-2016-106.

³ UFC provide guidance for planning, designing, constructing, sustaining, restoring, and modernizing DoD facilities.

⁴ Project No. D2016-D000PT-0085.000, Military Facilities Inspection – Camp Buehring, Kuwait, announced on January 4, 2016.

⁵ DoD uses BOSS contracts to provide facilities maintenance and other life support functions at military installations.

⁶ Report Nos. DODIG-2015-014, DODIG-2013-137, DODIG-2016-065, DODIG-2015-160, DODIG-2014-069, DODIG-2013-097, DODIG-2011-078, and DODIG-2015-163.

Finding A

Inspection Summary Results: All Six DoD OIG Inspection Reports Identified Health and Safety Deficiencies and Weaknesses in Inspections and Maintenance

The DoD OIG issued six reports from July 2013 to July 2016 related to health and safety inspections of DoD facilities at various locations around the world, documenting 3,783 deficiencies in electrical system safety, fire protection systems, and environmental health and safety. During these inspections, the DoD OIG issued 12 notices of concern (NOCs),⁷ detailing 319 critical deficiencies requiring immediate action at 24 of the 36 installations inspected.

Five of the six inspection reports contained recommendations for the Military Departments to conduct a root cause analysis for each deficiency in addition to performing corrective actions. All six inspection reports documented overall weaknesses in the inspection and maintenance of facilities. Furthermore, all six inspection reports recommended that inspection and maintenance programs for facilities be reviewed and improvements be made, including the need to ensure sufficient qualified resources are available to execute these programs. Additional recommendations addressed the need to perform periodic inspections and maintenance of DoD facilities and military housing to ensure compliance with health and safety requirements.

The deficiencies we identified in the previous inspections and the lack of consistent inspections and maintenance programs resulted in DoD personnel and military families being exposed to health and safety hazards at installations around the world.

Previous DoD OIG Inspection Report Overview

The DoD OIG issued six reports from July 2013 through July 2016 on inspections of DoD facilities and housing at military installations located in:

- Afghanistan (2 installations),
- Japan (15 installations),
- Republic of Korea (13 installations),
- National Capital Region (2 installations),
- Southeastern region of the United States (3 installations), and
- Jordan (1 installation).

⁷ A NOC is a memorandum that the DoD OIG uses to inform appropriate DoD management of any issues identified during its inspections that require immediate attention.

These inspection reports consistently identified a multitude of deficiencies with respect to electrical system safety, fire protection systems, and environmental health and safety. See Table 1 for details on the number of deficiencies and recommendations.

Table 1. Deficiencies and Recommendations Identified in Previous DoD OIG Inspection Reports on Health and Safety Inspections of Facilities

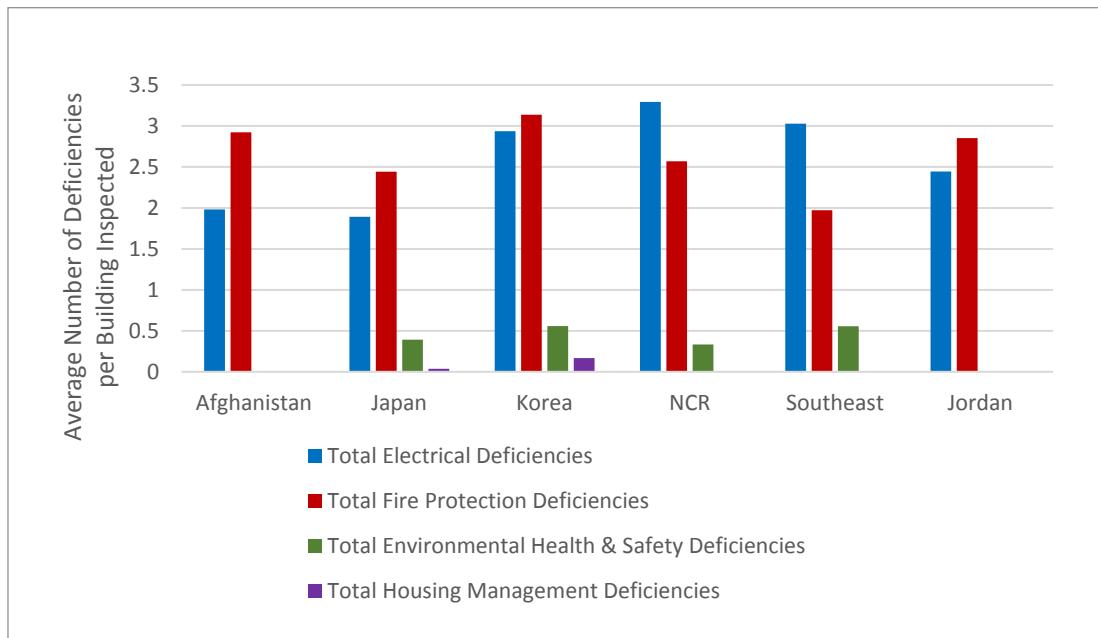
Inspection Report Number	Location	Installations Inspected	Deficiencies						Report Recommendations
			Electrical System Safety	Fire Protection	Environmental Health & Safety	Housing Management	Total	Critical	
DODIG-2013-099	Afghanistan	2	440	649	N/A ¹	N/A ²	1,089	71	11
DODIG-2014-121	Japan	15	420	542	87	8	1,057	145	8
DODIG-2015-013	Korea	13	279	298	53	16	646	11	9
DODIG-2015-162	U.S. – NCR	2	168	131	17	N/A ²	316	0	17
DODIG-2015-181	U.S. – Southeast	3	212	138	39	N/A ²	389	15	37
DODIG-2016-106	Jordan	1	132	154	N/A ¹	N/A ²	286	77	4
Totals		36	1,651	1,912	196	24	3,783	319	86

¹ The Afghanistan and Jordan inspections did not include the environmental health and safety category.

² The housing management category was included only in the Japan and Korea inspections.

Examples of deficiencies identified during these inspections include improperly grounded electrical equipment; exposed or unprotected energized wiring; missing, obstructed, damaged, and disabled smoke detectors, fire alarms, and fire suppression sprinklers; and mold, moisture, and ventilation problems.

We found that the average number of deficiencies per building was consistent regardless of location (see Figure 1). For instance, we found an average of two to three electrical and fire protection deficiencies for each building inspected, and about one environmental health and safety deficiency for every two buildings inspected. The pervasiveness of electrical system safety, fire protection, and environmental health and safety deficiencies was the most significant trend that we observed.

Figure 1. Average Number of Deficiencies per Building Inspected

Critical Deficiencies Identified in All Categories

We identified critical deficiencies—those that required immediate attention or corrective action—across all categories during our previous inspections. These categories include electrical system safety, fire protection, and environmental health and safety. See Table 2 for details on the critical deficiencies.

Table 2. Critical Deficiencies by Inspection Category

Inspection Report Number	Location	Installations with Critical Deficiencies	Installations Inspected	Critical Deficiencies		
				Electrical System Safety	Fire Protection	Environmental Health & Safety
DODIG-2013-099	Afghanistan	2	2	44	27	N/A
DODIG-2014-121	Japan	14	15	29	106	10
DODIG-2015-013	Korea	5	13	5	5	1
DODIG-2015-162	U.S. – NCR	0	2	0	0	0
DODIG-2015-181	U.S. – Southeast	2	3	0	14	1
DODIG-2016-106	Jordan	1	1	42	35	N/A
Totals		24	36	120	187	12

These critical deficiencies included safety problems, such as:

- inadequate fire alarm systems, smoke alarms, and automatic fire suppression sprinkler systems;
- improper or compromised means of egress;
- systemic lack of ground-fault circuit interrupter (GFCI)-protected outlets;
- ungrounded building components;
- exposed electrical wiring; and
- unmitigated mold growth in multiple buildings and family housing units.⁸

These critical deficiencies were representative of the overall issues we found in our inspections. Critical deficiencies were found in all categories—fire protection, electrical system safety, and environmental health and safety—but we did not identify a single, predominant type of critical deficiency. See Appendix C for more detail on these critical deficiencies.

Root Cause Analysis Recommended in Previous Inspection Reports

During all six of our previous inspections, we identified health and safety deficiencies, but we did not seek to determine the specific root causes for each deficiency. However, we recommended that the Military Departments conduct such an analysis. For example, the Japan inspection report and the four subsequent inspection reports recommended that the Military Departments conduct a root cause analysis for each deficiency in addition to performing corrective actions.⁹ Our inspections identified similar deficiencies at all installations visited; therefore, we believe it is imperative that DoD Components responsible for facilities management conduct such analyses and use the results of these root cause analyses to improve facility management processes.

Systemic Weaknesses in Inspections and Maintenance

The previous six inspection reports discussed systemic problems in inspections and maintenance of DoD facilities. For instance, Report No. DODIG-2013-099 stated that installations “lacked qualified Government or contractor electricians to perform inspection, testing, and maintenance,” and had “inadequate Government resources to conduct fire protection inspections of facilities.” Similarly, Report Nos. DODIG-2014-121 and DODIG-2015-013 both stated, “[f]acilities management did not always perform preventive, recurring, and cyclic maintenance.”

⁸ In addition to the critical mold-related deficiencies in Report No. DODIG-2014-121, we also documented mold-related problems in all three of the reports that included environmental health and safety inspections (Report Nos. DODIG-2015-013, DODIG-2015-162, and DODIG-2015-181).

⁹ Report Nos. DODIG-2014-121, DODIG-2015-013, DODIG-2015-162, DODIG-2015-181, and DODIG-2016-106.

Report Nos. DODIG-2015-162 and DODIG-2015-181 both stated that the installations did not ensure that electrical; fire protection; and heating, ventilation, and air conditioning systems were properly installed, periodically inspected, and adequately maintained. Furthermore, Report No. DODIG-2016-106 stated, “deficiencies were the result of a lack of inspection and routine maintenance.” All six previous inspection reports cited weaknesses in the inspection and maintenance of facilities. Additionally, five of the six previous inspection reports attributed the majority of deficiencies to improper installation, insufficient inspection, and inadequate maintenance and repair of facilities.

The previous inspection reports recommended that the Military Departments review inspection and maintenance programs and ensure that sufficient qualified resources are available to periodically inspect facilities. Additionally, the recommendations in the previous inspection reports addressed the importance of continued periodic inspections and maintenance to ensure compliance with health and safety requirements for DoD facilities and military housing. These recommendations accounted for 25 of the 86 recommendations contained in the 6 inspection reports. In response to the reports, management stated that it generally agreed with these specific recommendations. DoD policy and guidance requires periodic inspections of DoD facilities, including standardized facility condition assessments, annual fire risk management inspections, and annual safety and occupational health inspections. However, none of these inspections comprehensively examine the effectiveness of facility sustainment processes with respect to the overall health and safety of occupants. Despite the existing periodic inspections that the DoD policy and guidance mandates, our six previous inspection reports documented a significant number of deficiencies at DoD facilities. Based on this, we conclude that the existing inspections are either not comprehensive enough to ensure the health and safety of occupants or have not resulted in appropriate corrective actions. In our opinion, additional oversight performed by the Military Departments’ headquarters would help identify Service-wide deficiencies in the inspection and maintenance of facilities.

Conclusion

In light of the systemic problems that were identified in the six inspection reports, DoD officials need to take action to improve the condition of facilities for the health and safety of occupants. As previously discussed, our inspection reports in general attributed the majority of deficiencies to improper installation, insufficient inspections, and inadequate maintenance and repair of facilities. We believe that the majority of deficiencies identified in our previous reports could have been avoided if the DoD inspected facilities periodically and upon completion of construction, renovation, and maintenance work, identifying any noncompliance with requirements and taking appropriate corrective action.

In addition to the Military Departments taking action to improve inspections and maintenance in response to the previous reports, the Military Departments should also undertake independent verification efforts to ensure the overall effectiveness of facility sustainment programs. The performance of these independent health and safety inspections would allow the DoD to identify problems with existing facilities sustainment processes that result in negative health and safety impacts. Accordingly, the Military Departments should begin performing independent inspections of facilities. The inspections should focus on health and safety to identify—at a minimum—critical deficiencies as well as root causes for the deficiencies. These inspections should consist of the physical examination of facilities and housing for compliance with electrical system safety, fire protection, and environmental health and safety (such as, drinking water quality, radon, mold, pest infestation, lead-based paint, asbestos, and radiation) requirements. These inspections should be conducted by teams of subject matter experts that are sufficiently independent from the organization responsible for managing the facilities (for example, the Component Inspector General staff). We believe that each Military Department should perform these independent health and safety inspections for at least two installations per year, and preferably more. Locations inspected should allow comparisons to be made between installations in different geographic areas around the world within each Military Department as well as across the DoD.

We also recommend that the DoD establish a working group that meets periodically to identify improvements in facility inspection and maintenance programs. Because the results of previous DoD OIG inspections have been consistent across locations, including installations operated by each of the Military Services, a joint-Service collaborative approach to address the underlying problems could be beneficial. The working group should use the results of the independent Military Departments' inspections, share best practices, and unify facility maintenance processes where appropriate to improve the management of and investments in facilities maintenance and repair.

Recommendations, Management Comments, and Our Response

Recommendation A.1

We recommend that the Secretaries of the Military Departments annually perform at least two comprehensive, independent inspections of installations. The purpose of these inspections is to verify compliance with all applicable health and safety requirements.

Department of Army Comments

The Assistant Secretary of the Army for Installations, Energy, and Environment, responding for the Secretary of the Army, agreed, stating that the Army will develop a plan in the next 180 days to implement the recommendation.

Department of Navy Comments

The Principal Deputy Assistant Secretary of the Navy for Energy, Installations, and Environment, responding for the Secretary of the Navy, agreed, stating that the Navy will develop guidance for the conduct of such inspections by October 31, 2016.

Department of Air Force Comments

The Principal Director, Built Infrastructure Policy and Programs, Office of the Deputy Assistant Secretary of the Air Force for Environment, Safety, and Infrastructure, responding for the Secretary of the Air Force, agreed without comment.

Our Response

Comments from the Army and Navy addressed the specifics of the recommendation, and no further comments are required. However, comments from the Air Force only partially addressed the specifics of the recommendation. Although the Principal Director agreed with the recommendation, she did not state what actions the Air Force is planning to take. Therefore, we ask that the Secretary of the Air Force provide additional comments in response to the final report, identifying specific actions that will be taken and the associated timeline to implement the recommended independent health and safety inspections.

Recommendation A.2

We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD(AT&L)) establish a joint-Service working group that meets periodically to identify improvements in facility inspection and maintenance programs. The working group should, as a minimum, use the results from the independent inspections recommended in Recommendation A.1 and the results of the root cause analyses recommended in the previous DoD Office of Inspector General inspection reports to create and implement a plan for improvements in inspection and maintenance programs across the DoD.

USD(AT&L) Comments

The Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment, responding for the USD(AT&L), partially agreed, stating that the Department already has such a working group, the Sustainment Management System (SMS) Operations, Governance, and Configuration Support Panel. As stated in its charter, this working group provides program oversight, control, and responsibility for the SMS. The Principal Deputy stated that this working group has reviewed the previous DoD OIG inspection reports to ensure that items identified as deficiencies are inspectable items in the SMS tool¹⁰ and the working group will continuously review the SMS tool to ensure it remains relevant.

Our Response

Comments from the Principal Deputy partially addressed the recommendation. Although the Principal Deputy agreed and stated that such a working group already exists, this working group's charter does not require periodic review of the results of independent health and safety inspections agreed to by the Military Departments in response to Recommendation A.1. Therefore, we ask that USD(AT&L) provide additional comments in response to the final report, identifying specific actions that will be taken by the working group to create and implement a plan for improvements in inspection and maintenance programs across the DoD. The plan for improvements should be based on the results of these independent health and safety inspections.

¹⁰ SMS is a software application developed by the U.S. Army Corps of Engineers and adopted by the DoD to help civil engineers, technicians, and managers decide when, where, and how to best maintain building infrastructure.

Finding B

Audit Summary Results: Systemic Problems With DoD Development and Oversight of Base Operations and Support Services Contracts in Contingency Operations

The DoD OIG issued eight audit reports from June 2011 through March 2016 related to BOSS contracts and facilities maintenance, worth about \$1.8 billion,¹¹ in BOSS contracts to provide facilities maintenance and other life support functions.

The eight audit reports identified two systemic contracting and oversight problem areas. Specifically, five audit reports identified problems with contract documentation and requirements and six audit reports identified contract oversight problems, including that the DoD did not hold contractors accountable for poor performance while constructing and maintaining facilities.

As a result, there were increased life and safety risks to service members, and the poor contract documentation and oversight did not ensure that the DoD received the best value for its money spent on these contracts. In response to the previous DoD OIG audit report findings and recommendations, U.S. Army Central (ARCENT) and Army Contracting Command–Rock Island (ACC-RI) officials identified corrective actions to address our specific recommendations. However, ACC-RI only took corrective actions to address the specific contracts we reviewed, leaving other BOSS contracts at installations throughout Southwest Asia susceptible to poor contract requirements and oversight.

Overview of Previous DoD OIG Audits of Base Operations and Support Services Contracts

The DoD uses BOSS contracts to provide facilities maintenance and other life support functions. The DoD OIG conducted audits at military installations located in Afghanistan, Jordan, Qatar, Kuwait, and Djibouti.

Overall, the audits identified challenges associated with (1) contract documentation, and requirements; and (2) oversight of BOSS contracts in contingency environments. DoD commands did not properly assess the contractor's performance, hold the contractors accountable for poor performance, or ensure the DoD received the best value for its money spent on these contracts. These problems increased life and safety risks to service members, civilians, and contractors stationed at these facilities.

¹¹ This is an approximate dollar value based on the contract values listed in six reports. Two of the reports did not contain BOSS contract values.

The eight audit reports identified two systemic contracting and oversight problems: a lack of clearly defined contract requirements, and poor contract oversight. Specifically, five audit reports identified problems with contract documentation, such as missing or incorrect criteria and lack of clearly defined requirements in the performance work statement (PWS).¹² In addition, six audit reports identified contract oversight shortfalls, including the failure to develop adequate surveillance plans and consistently hold contractors accountable for poor performance while constructing and maintaining facilities.¹³ Table 3 describes problem areas identified in each audit report and the associated effects. In addition to the BOSS contracts at the installations we reviewed, other BOSS contracts at installations throughout Southwest Asia are susceptible to these systemic problems.

Table 3. Systemic Problem Areas and Effects

Audit Report Number	Location	Contract Documentation		Oversight		Effect	
		Requirements	Contract / PWS	Failure to Hold Contractor Accountable	Poor Contractor Oversight	Ineffective Use of Funds	Life and Safety Risk Identified
DODIG-2016-065	KASOTC,* Jordan	X	X	X	X	X	X
DODIG-2015-163	Camp Lemonnier, Djibouti				X		X
DODIG-2015-160	KASOTC, Jordan		X		X		X
DODIG-2015-014	Bagram Air Field, Afghanistan			X	X	X	
DODIG-2014-069	Camp As Sayliyah, Qatar	X	X			X	
DODIG-2013-137	Kandahar Air Field, Afghanistan			X			X
DODIG-2013-097	Camp As Sayliyah, Qatar	X	X		X	X	X
DODIG-2011-078	Camp Arifjan, Kuwait	X	X			X	

* King Abdullah II Special Operations Training Center

¹² DoD OIG Report Nos. D-2011-078, DODIG-2013-097, DODIG-2014-069, DODIG-2015-160, and DODIG-2016-065.

¹³ Report Nos. DODIG-2013-097, DODIG-2013-137, DODIG-2015-160, DODIG-2016-065, DODIG-2015-014, and DODIG-2015-163.

Contracts Lacked Clear Requirements and Guidance

Five audit reports identified problems with contract documentation across three Army bases in Qatar, Kuwait, and Jordan. The problems included unclear or missing requirements in the contract, inadequate guidance in the PWS, and a missing clause from the contract.

Contract PWS Requirements

According to the Federal Acquisition Regulation (FAR),¹⁴ a contract PWS defines performance requirements, which enable the assessment of contractor performance against measurable standards. The PWS must describe the required performance results in clear, specific, and objective terms with measurable outcomes.

DoD OIG Report No. D-2011-078 found that ACC-RI officials did not properly plan for the transition to the three BOSS contracts in Kuwait. Specifically, ACC-RI officials did not implement a recurring process to validate contract requirements in the PWS. ACC-RI officials validated the requirements before awarding the contracts; however, in a contingency environment, mission requirements fluctuate and need to be regularly revalidated. ACC-RI should revalidate and revise contract requirements in contingency BOSS contracts to ensure the requirements align with any changes in mission requirements.

Report No. DODIG-2016-065 found that ARCENT and ACC-RI officials did not include appropriate requirements in the BOSS contract for the King Abdullah II Special Operations Training Center (KASOTC), Jordan, to ensure facility heating, ventilation, and air conditioning systems were repaired and replaced. Specifically, the contract requirements to repair and replace the HVAC systems for four types of facilities were not prioritized as required by a U.S. Central Command regulation.¹⁵ Additionally, the officials mistakenly omitted a Defense Federal Acquisition Regulation Supplement (DFARS) clause¹⁶ for safety of facilities, infrastructure, and equipment for military operations from the contract.

Report No. DODIG-2013-097 found that the ACC-RI contracting officer did not clarify the contractor's responsibility in the PWS to provide a medical doctor to supervise the medical and professional aspects of health care services provided in accordance with the FAR¹⁷ and the contractor's proposal. This occurred because not all terms from the proposal were translated into the contract PWS. As a result, DoD officials paid about \$211,000 in questionable labor costs for an official who

¹⁴ FAR Part 37, "Service Contracting," FAR Subpart 37.602, "Performance work statement."

¹⁵ U.S. Central Command (USCENTCOM) Regulation 415-1, "Construction in the USCENTCOM Area of Responsibility, 'The Sand Book,'" July 18, 2014.

¹⁶ DFARS Part 252, "Solicitation Provisions and Contract Clauses," DFARS Subpart 252.246.7004, "Safety of Facilities, Infrastructure, and Equipment for Military Operations."

¹⁷ FAR Part 37, "Service Contracting," FAR Subpart 37.4, "Nonpersonal Health Care Services."

was not a medical doctor and not qualified to direct the medical staff. The Under Secretary of Defense for Acquisition, Technology, and Logistics should develop standard procedures or templates for BOSS contracts in contingency environments to assist in the development of future BOSS contracts to ensure minimum requirements and applicable clauses and regulations are included.

Contract Documentation Weaknesses Resulted in Increased Life and Safety Risks and Ineffective Use of Funds

Report No. DODIG-2016-065 found that ACC-RI and ARCENT officials did not include a contract requirement to prevent and remove mold and mildew within facilities housing U.S. personnel at KASOTC consistent with Army Regulation 420-1.¹⁸ The report documented mold/mildew present within the showers at four KASOTC lodging facilities, which posed a direct health hazard to DoD personnel.

In addition, four audit reports identified potential or measureable ineffective use of funds. For example, Report No. DODIG-2014-069 found that contracting officer's representatives (COR) and the administrative contracting officers did not review or approve \$3.5 million worth of purchase requests for materials and supplies. This occurred because guidance for reviewing purchase requests from the solicitation was not added to the contract's PWS, resulting in the risk that contracting officials would not be able to verify the appropriate use of those contract funds.

Contract Oversight Was Not Effective for Base Operations and Support Services Contracts

Six audit reports identified contract oversight problems at four Army and Navy installations located in Qatar, Afghanistan, Jordan, and Djibouti. Specifically, the contracting officers and CORs did not effectively monitor contractors' performance and hold each contractor accountable for poor performance.

Contract Oversight Roles and Responsibilities

According to the FAR,¹⁹ contracting officers are required to ensure the performance of all necessary actions for effective contracting, compliance with the terms of the contract, and safeguard the interests of the United States in its contractual relationships. Contracting officers often delegate specific authority to members of the requiring activity, known as CORs, to conduct contract surveillance, verify the contractor is fulfilling contract delivery and quality requirements, and document contractor performance.

¹⁸ Army Regulation 420-1, "Army Facilities Maintenance."

¹⁹ FAR Part 1, "Federal Regulation Systems," FAR Subpart 1.602, "Contracting Officers."

Report No. DODIG-2013-137 found that the DoD did not properly monitor maintenance for 23 facilities reviewed, valued at \$67.5 million, at Kandahar Airfield, Afghanistan. As a result, 19 of the 23 facilities, worth approximately \$43.1 million, were either not used or were not constructed to acceptable standards of quality. Specifically, four of the facilities were partially on the Density List²⁰ and required significant repairs and experienced deficiencies with critical systems. The remaining 19 facilities had deficiencies that prevented them from being added to the Density List. The report also found that constructed facilities were not sustainable. In addition, the fire suppression systems in 21 of the 23 facilities could not adequately suppress a fire putting the life and safety of the occupants in jeopardy. Specifically, the fire suppression system and fire detection system in multiple facilities were inoperable. These conditions occurred because the DoD did not hold the construction contractors accountable for unsatisfactory performance, as required by the contract, for performance that did not meet required acceptable standards of quality.

Report No. DODIG-2016-065 found that in the KASOTC BOSS contract, ARCENT and ACC-RI officials did not verify if facilities received periodic maintenance in accordance with contract requirements. Specifically, contract oversight problems occurred because the contract had 18 periodic maintenance requirements; however, the contractor's quality control plan and the ARCENT quality assurance surveillance plan (QASP) only listed 2 of 18 and 7 of 18 periodic maintenance requirements, respectively. As a result, adequate oversight controls were not in place to determine whether the DoD received all requirements specified in the contract. The Under Secretary of Defense for Acquisition, Technology, and Logistics should develop standard procedures and templates for BOSS contracts in contingency environments to ensure that contracting oversight officials are trained and the QASP includes the minimum standards to measure contract requirements. In addition, ACC-RI should revise the QASP to align with any revised contract requirements to ensure oversight methods are consistent with the contract requirements.

Contract Oversight Resulted in Increased Life and Safety Risks and Negative Monetary Impacts

Five audit reports identified problems with contractor oversight that increased the risk of life and safety concerns of U.S. personnel. The reports determined that without proper oversight, personnel were at an increased risk of exposure to hazards, to include illness, injury, or death. For example, the ARCENT QASP lacked oversight controls to determine if the contractor had installed and properly maintained fire extinguishers and smoke detectors. The report determined that

²⁰ A Density List documents all facilities at an installation that are authorized to receive maintenance from the contractor.

the contractor did not install fire extinguishers and smoke detectors in several KASOTC latrines, which created a significant, but avoidable, risk to assigned U.S. personnel.

In addition, a lack of oversight and failure to hold the contractors accountable to ensure they delivered BOSS functions effectively could cost the DoD additional funds. For example, Report No. DODIG-2015-014 documented that the Westside Utilities Infrastructure project at Bagram Airfield, Afghanistan, was dependent on the completion of the Bagram sewer system project. The poor design and workmanship of the incomplete Bagram sewer system led to the determination that an additional \$1.3 million would be required to make the entire system fully operational.

Recommendations of Previous Audit Reports

The eight audit reports contained nine recommendations (three open, six closed) addressing contract oversight and nine recommendations (four open, five closed) addressing contract documentation. In response to these recommendations, the DoD developed procedures to ensure contracting officers were familiar with regulatory requirements that were required in the contracts; held the contracting officials responsible for oversight and contractors accountable for not meeting acceptable standards; and reviewed and revised the QASP as needed.

To address the lack of clearly defined requirements and inadequate contract PWS identified in the audit reports, ACC-RI modified contract documents, including the contract PWS, to include necessary information from solicitations and applicable criteria and clauses, and ensured that requirements were adequately defined. For example, Report No. DODIG-2014-069 recommended that ACC-RI direct the procuring contracting officer to incorporate contract guidance in the PWS for procuring materials and supplies in accordance with the solicitation. ACC-RI agreed and modified the PWS to include the recommended guidance in the contract for option year 4 of the contract.

Conclusion

In response to the previous DoD OIG audit report findings and recommendations, ARCENT and ACC-RI officials identified the corrective actions to address our specific recommendations. However, ACC-RI only took corrective actions to address the specific contracts we reviewed, leaving other BOSS contracts at installations throughout Southwest Asia susceptible to poor contract requirements and oversight. Based on the systemic problem areas that were identified in the eight audit reports reviewed, DoD officials need to take action on the following recommendations to improve the contracting process in current and future contingency operations.

Recommendations, Management Comments, and Our Response

Recommendation B.1

We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics develop standard procedures or templates for each service that can be performed under Base Operations and Support Services contracts (for example, facility maintenance and life support functions) in contingency environments to assist the DoD in the development and oversight of those contracts.

- a. Identify minimum requirements to include in the performance work statement and minimum standards to measure those requirements in the quality assurance surveillance plans. Identify applicable Federal Acquisition Regulation clauses and DoD regulations that should be included in the contract.**

USD(AT&L) Comments

The Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment, responding for the USD(AT&L), partially agreed. He stated that minimum requirements and clauses for performance work statements and minimum standards to measure those requirements in the quality assurance surveillance plan are adequately described in FAR 11.2/DFARS 211.2, "Describing Agency Needs," and FAR 37.6/DFARS 237.6, "Performance-Based Acquisition." Responsibility for identifying specific requirements, such as quantities and standards, are the responsibility of the Military Departments, not the USD(AT&L).

Our Response

Comments from the Principal Deputy partially addressed the recommendation. Although the Principal Deputy stated that minimum requirements for performance work statements and quality assurance surveillance plans are included in FAR 11.2/DFARS 211.2, "Describing Agency Needs," and FAR 37.6/DFARS 237.6, "Performance-Based Acquisition," these requirements need to be reinforced to avoid omitting critical clauses and oversight standards discussed in this report. For example, contracting officials mistakenly omitted a DFARS clause for the safety of facilities, infrastructure, and equipment for military operations from the KASOTC contract. While the Principal Deputy stated that identifying specific requirements, such as quantities and standards, is the responsibility of the Military Departments, as discussed in the report we identified a lack of clearly defined requirements and inadequate contract performance work statements in our previous audit reports. Therefore, we request that USD(AT&L) provide additional comments in response to the final report identifying actions that will be taken to reinforce these FAR and DFAR requirements to the Military Departments.

- b. Identify minimum training that must be completed by personnel before overseeing Base Operations and Support Services contracts.**

USD(AT&L) Comments

The Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment, responding for the Under Secretary of Defense for Acquisition, Technology, and Logistics, partially agreed, stating that minimum training requirements are identified in the DoD Contracting Officer's Representative (COR) Handbook.

Our Response

Comments from the Principal Deputy partially addressed the recommendation. Although the Principal Deputy stated that minimum training requirements are identified in the COR Handbook, those requirements need to be reinforced to ensure oversight personnel are consistently completing the training requirements and identifying training requirements specific to each BOSS contract. This report identified instances where oversight officials did not effectively monitor contractor performance. Specifically, five audit reports identified problems with contractor oversight that increased the risk of life and safety concerns of U.S. personnel. The reports determined that without proper oversight, personnel were at an increased risk of exposure to hazards, to include illness, injury, or death. For example, the U.S. Army Central quality assurance surveillance plan (QASP) lacked oversight controls to determine if the contractor had installed and properly maintained fire extinguishers and smoke detectors. Therefore, we request that USD(AT&L) provide additional comments in response to the final report identifying the actions that will be taken specific to oversight of BOSS contracts to reinforce and strengthen these training requirements to the Military Departments.

- c. Develop minimum requirements for a comprehensive risk assessment for each potential service performed under Base Operations and Support Services contracts that includes risk levels, timeframes for addressing each risk, and a mechanism to recover funds for services not completed.**

USD(AT&L) Comments

The Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment, responding for the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics, disagreed, stating that it is inappropriate to establish a comprehensive set of risk factors for Military Departments given the variability of the factors that can affect risk. The DoD relies on the Military Departments to define risk using its own judgement of requirements, potential impact to mission, life, safety, health, and conditions on the ground. The Office of the Secretary of Defense Comptroller and its subordinate organizations has procedures for recovering funds for services not provided/completed in contracts.

Our Response

Comments from the Principal Deputy did not address the specifics of the recommendation. We agree that the Military Departments define risk using their own judgement of requirements; potential impact to mission, life, safety, health; and conditions on the ground. We also agree that the Office of the Secretary of Defense Comptroller and its subordinate organizations have procedures for recovering funds for services not provided or completed in contracts. However, our report identified a systemic issue across multiple BOSS contracts with contractor's failure to perform requirements under the contract and not holding the contractor accountable for poor performance, resulting in life and safety issues. For example, Report No. DODIG-2013-137 documented that the fire suppression system in 21 of the 23 facilities could not adequately suppress a fire because the DoD did not hold the contractors accountable for unsatisfactory performance, resulting in increased life and safety risks. Although the Military Departments are responsible for individual BOSS contracts, we believe the multiple examples of deficiencies identified in this report demonstrate systemic health and safety issues that the DoD needs to address at a higher level. Therefore, we request that USD(AT&L) reconsider its position on the recommendation and provide comments in response to the final report.

Recommendation B.2

We recommend that the Commander, Army Contracting Command-Rock Island, in coordination with the requiring activity for Base Operations and Support Services contracts awarded in a contingency environment:

- a. Revalidate contract requirements before exercising the next option year and revise as needed to ensure the contract requirements align with changes in mission requirements in contingency environments.**

Army Contracting Command-Rock Island Comments

The Deputy to the Commanding General, U.S. Army Materiel Command, responding for the Commander, U.S. Army Contracting Command-Rock Island, agreed, stating that the U.S. Central Command Operations Contracting Support Integration Cell is working initiatives to facilitate timely requirement document submissions. The contracting officer will ensure the contract incorporates any changes to the requirements when exercising options, when allowable under applicable statute and regulation.

Our Response

Comments from the Deputy addressed all specifics of the recommendation, and no further comments are required.

- b. Revise quality assurance surveillance plans (QASPs) to ensure oversight methods remain consistent with services added or deleted during the requirements revalidation process described in Recommendation B.2.a.**

Army Contracting Command–Rock Island Comments

The Deputy to the Commanding General, U.S. Army Materiel Command, responding for the Commander, U.S. Army Contracting Command–Rock Island, agreed. He stated that the contracting officer will check if the requiring activity has revised the QASP to reflect changes consistent with services added or deleted during the requirements revalidation process. Any revisions to the QASP allowable under the applicable statute and regulation will result in contract modification.

Our Response

Comments from the Deputy addressed all specifics of the recommendation, and no further comments are required.

Finding C

Policy Evaluation Results: The DoD Improved Its Health and Safety Policy and Guidance for DoD Facilities Worldwide but Some Guidance Needs to be Permanent Policy

Since 2010, the DoD has been improving its policy and guidance establishing health and safety requirements to strengthen requirements for all facilities occupied by DoD personnel. The improvements include publications that establish safety and habitability requirements for facilities used in support of military operations, environmental policy for contingency locations, and priorities for reinvesting in facilities sustainment. We did not identify any significant gaps or conflicts of coverage in these policies and guidance with respect to electrical system safety, fire protection, environmental health and safety, and general building requirements.

However, the Under Secretary of Defense for Acquisition, Technology, and Logistics should incorporate into permanent policy his memorandums that implement standardized facility condition assessments and prioritize the reinvestment in facilities sustainment.

General Building, Fire Protection, Electrical System Safety, and Environmental Health and Safety Policy and Guidance

We evaluated DoD policy and guidance that establishes health and safety requirements for DoD-occupied facilities and military housing. Although health and safety requirements for DoD facilities were generally well-defined, they were dispersed across many different policy and guidance documents. We did not identify any significant gaps in policy and guidance establishing health and safety requirements for DoD facilities worldwide, with the exception of mold and radon guidance for overseas installations. However, the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics (OUSD[AT&L]) was in the process of developing DoD guidance to address this concern.

Based on a congressional mandate in 1997, the DoD established unified design guidance for facilities in the form of the Unified Facilities Criteria (UFC). The UFC provides guidance for planning, designing, constructing, sustaining, restoring, and modernizing DoD facilities. Accordingly, DoD policy for military construction,

contingency basing, and relocatable facilities require compliance with the UFC. The UFC defines general building, fire protection, and electrical system safety requirements for permanent, nonpermanent, host nation, and existing facilities for use in military operations.

DoD Directive (DoDD) 4715.1E, "Environment, Safety, and Occupational Health," March 19, 2005, establishes policies on the environment, safety, and occupational health to sustain and improve the DoD mission. In accordance with this Directive, subsequent DoD issuances address requirements for environmental compliance and specific environmental focal areas²¹ for operations and installations inside and outside the United States. For facilities in the United States, DoD Instruction (DoDI) 4715.06, "Environmental Compliance in the United States," May 4, 2015, requires compliance with applicable Federal law.²² For facilities outside the United States not associated with contingency operations, specific requirements are documented in DoD 4715.05-G, "Overseas Environmental Baseline Guidance Document," (OEBGD), May 1, 2007. See Table 4 for details on DoD policy and guidance coverage of health and safety requirements for facilities.

Table 4. DoD Policy and Guidance on Health and Safety Requirements for Facilities

Policy/Guidance Document	Category				Facility/Operation Type	Location
	General Building Requirements	Fire Protection	Electrical System Safety	Environmental Health & Safety		
DoDD 3000.10, "Contingency Basing Outside the United States," January 10, 2013	X	X	X	X	Contingency operations	OCONUS ¹
DoDD 4715.1E, "Environment, Safety, and Occupational Health (ESOH)," March 19, 2005		X		X	All DoD operations	Worldwide
DoDD 4270.5, "Military Construction," February 12, 2005	X	X	X	X	All facilities except privatized housing ²	Worldwide
DoDI 4715.22, "Environmental Management Policy for Contingency Locations," February 18, 2016				X	Contingency operations	OCONUS
DoDI 4715.06, "Environmental Compliance in the United States," May 4, 2015				X	All DoD operations	CONUS ³

²¹ Environmental focal areas evaluated include asbestos, lead-based paint, drinking water quality, radon, pest management, mold, and radiation.

²² Applicable Federal law includes "Toxic Substances Control Act" (15 U.S.C. § 2601-2692), "Safe Drinking Water Act" (42 U.S.C. § 300f-300j-26), and "Federal Insecticide, Fungicide, and Rodenticide Act" (7 U.S.C. § 136).

Table 4. (cont'd)

Policy/Guidance Document	Category				Facility/Operation Type	Location
	General Building Requirements	Fire Protection	Electrical System Safety	Environmental Health & Safety		
DoDI 6055.01, "DoD Safety and Occupational Health (SOH) Program," October 14, 2014		X		X	All nonmilitary-unique operations	Worldwide
DoDI 4715.05, "Environmental Compliance at Installations Outside the United States," November 1, 2013				X	All DoD operations except contingency	OCONUS
DoD 4715.05-G, "Overseas Environmental Baseline Guidance Document," May 1, 2007 ⁴				X	All DoD operations	OCONUS
DoDI 4165.56, "Relocatable Buildings," January 7, 2013		X			Prefabricated relocatable buildings	Worldwide
DoDI 6055.08, "Occupational Ionizing Radiation Protection Program," December 15, 2009				X	All DoD personnel	Worldwide
DoDI 6055.05, "Occupational and Environmental Health (OEH)," November 11, 2008				X	All DoD operations	Worldwide
DoDI 4150.07, "DoD Pest Management Program," May 29, 2008				X	All DoD operations except privatized housing ²	Worldwide
DoDI 6055.06, "DoD Fire and Emergency Services (F&ES) Program," December 21, 2006		X			All DoD operations	Worldwide
UFC 3-101-01, "Architecture," Change 2, March 1, 2016	X			X	New construction of DoD-owned facilities	CONUS and as far as practical at overseas installations
UFC 3-520-01, "Interior Electrical Systems," October 6, 2015			X		All DoD facilities with exceptions for host nation facilities	Worldwide
UFC 1-200-01, "General Building Requirements," Change 3, August 1, 2015	X				New and renovated Government owned facilities for DoD use except public-private ventures	Worldwide
UFC 1-201-02, "Assessment of Existing Facilities for use in Military Operations," June 1, 2014	X	X	X		All existing facilities	Primarily OCONUS

Table 4. (cont'd)

Policy/Guidance Document	Category				Facility/Operation Type	Location
	General Building Requirements	Fire Protection	Electrical System Safety	Environmental Health & Safety		
UFC 1-202-01, "Host Nation Facilities in Support of Military Operations," September 1, 2013		X	X		Host nation personnel use	Primarily OCONUS
UFC 3-600-01, "Fire Protection Engineering for Facilities," Change 3, March 1, 2013		X			All new and existing DoD facilities	Worldwide
UFC 1-201-01, "Non-Permanent DoD Facilities in Support of Military Operations," January 1, 2013	X	X	X		Nonpermanent facilities	Primarily OCONUS
UFC 4-711-01, "Family Housing," July 13, 2006	X	X	X	X	All DoD family housing facilities	Worldwide

¹ Outside the continental United States.

² Privatized military housing in the United States is generally subject to Federal, state, and local requirements. However, specific requirements are defined by the associated contracts and agreements.

³ Continental United States.

⁴ Companion document for DoDI 4715.05.

Improvements in Policy and Guidance

Since 2010, policies have been developed for:

- contractual compliance with the specified UFC for overseas military operations, preoccupancy inspections of existing facilities, and design requirements for nonpermanent and host nation facilities;
- environmental management at contingency locations; and
- standardized facilities condition assessments.

Additionally, the OUSD(AT&L) stated that it was developing guidance to resolve inconsistencies between Military Service guidance on mold and radon.

New Policy and Guidance for the Safety and Habitability of Facilities Used in Support of Military Operations

DoD OIG Report No. IE-2009-006, issued in July 2009, stated that detailed policy guidance within the DoD did not specifically address the unique support situation posed by extended U.S. military use of host nation-constructed permanent

facilities in an unstable environment. The report stated that the DoD needed definitive policy for construction, operation, and maintenance of facilities at enduring bases in the theater of operations, particularly for extended use of host nation-constructed permanent facilities.

Section 807 of the National Defense Authorization Act for Fiscal Year 2010,²³ enacted by Congress in 2009, stated that it shall be DoD policy to inspect facilities, infrastructure, and equipment for safety and habitability before use by military and civilian personnel. It also requires the Secretary of Defense to define the applicable standards with respect to fire protection, structural integrity, electrical systems, plumbing, water treatment, waste disposal, and telecommunications networks.

In 2010, the DoD added requirements to the DFARS²⁴ for preoccupancy safety and habitability inspections and contractual compliance with the UFC. DFARS Part 246.270, “Safety of Facilities, Infrastructure, and Equipment for Military Operations,” applies to all contracts related to the “construction, repair, maintenance, or operation of facilities, infrastructure, and equipment configured for occupancy” for use by DoD personnel outside the United States and its territories. In 2013, minimum safety and habitability design requirements for non-permanent²⁵ and host nation²⁶ facilities in support of military operations were added to the UFC. Also, in 2014, criteria for evaluating existing facilities for use in military operations were added.²⁷

Additionally, in 2013, USD(AT&L) issued DoDD 3000.10, “Contingency Basing Outside the United States,” January 10, 2013, to establish policy for locations outside of the United States that support and sustain operations during named and unnamed contingencies or other operations. This Directive provides common standards for planning, design, and construction. This Directive also integrates a risk management approach to environmental health and safety, and minimizes the footprint and adverse impact on local populations. Joint Publication 1-02 defines the word “footprint” as “the amount of personnel, spares, resources, and capabilities physically present and occupying space at a deployed location.” These additions to DFARS and the UFC, along with DoDD 3000.10, establish safety and habitability requirements for facilities in support of military operations.

²³ Public Law 111-84, “National Defense Authorization Act for Fiscal Year 2010,” Section 807, “Policy and Requirements to Ensure the Safety of Facilities, Infrastructure, and Equipment for Military Operations.”

²⁴ DFARS is a supplement to the FAR that provides specific guidance for DoD procurement of goods and services. It contains legal requirements, DoD policies and procedures, delegations of FAR authorities, and deviations from FAR requirements applicable to DoD acquisitions.

²⁵ UFC 1-201-01, “Non-Permanent DoD Facilities in Support of Military Operations,” January 1, 2013.

²⁶ UFC 1-202-01, “Host Nation Facilities in Support of Military Operations,” September 1, 2013.

²⁷ UFC 1-201-02, “Assessment of Existing Facilities for Use in Military Operations,” June 1, 2014.

Environmental Health and Safety Policy Improvements for Contingency Locations

USD(AT&L) issued DoDI 4715.22, “Environmental Management Policy for Contingency Locations,” February 18, 2016. Before this Instruction was issued, policy for environmental compliance at installations outside the United States did not apply to contingency locations. DoDI 4715.22 requires the implementation of a risk management approach to environmental health and safety mandated by DoDD 3000.10 and establishes policy applicable to contingency locations to protect human health and manage safety and occupational health risks. DoDI 4715.22 also requires compliance with U.S. Federal laws, international law, and binding international agreements for operations at contingency locations. Furthermore, DoDI 4715.22 requires the DoD to establish and maintain contingency location environmental standards.

Open DoD OIG Report Recommendations Regarding DoD Policy for Radon and Mold

As previously discussed, the Overseas Environmental Baseline Guidance Document defines requirements for the environmental focal areas applicable to overseas installations, including asbestos, lead-based paint, drinking water quality, and pest management. However, it does not address requirements related to radon and mold. Our Japan and Korea inspection reports cited a lack of DoD guidance related to control, mitigation, and remediation of radon and mold and recommended that associated guidance be included within the OEBGD. The OUSD(AT&L) disagreed with our recommendations to include such guidance in the OEBGD. However, as of July 2016, the Deputy Assistant Secretary of Defense for Basing, performing the duties of the Assistant Secretary of Defense for Energy, Installations, and Environment stated that OUSD(AT&L) was taking a comprehensive view of guidance needed for all DoD-controlled housing worldwide and provided an update regarding its efforts to develop DoD guidance for radon and mold. He stated that DoD guidance to resolve inconsistencies between Military Services’ guidance for (1) mold control and remediation had a planned completion of October 2016 and (2) radon evaluation and mitigation had a planned completion of February 2017.

DoD Memorandums Issued to Improve Facilities Sustainment

The USD(AT&L) issued two memorandums in 2013 and 2014 to address standardized facility inspections and improved facility sustainment and recapitalization. USD(AT&L) memorandum, “Standardizing Facility Condition Assessments,” September 10, 2013, requires DoD Components to adopt a common process worldwide based on a sustainment management system developed by the Army Corps of Engineers for performing facility condition assessments.

The second memorandum, “Facility Sustainment and Recapitalization Policy,” April 29, 2014, acknowledges that a constrained fiscal environment had imposed sharp reductions to maintenance budgets, potentially undermining DoD’s investment in facilities over the last decade. This memorandum reiterates the need for the DoD to support its facilities through consistent, long-term investment to keep the facilities in good working order, and mandates the use of the standardized facility condition assessments to allow DoD Components to make informed decisions to address the growing maintenance and repair backlog.

We believe these two policy memorandums can help with progress in addressing systemic problems with facility maintenance across the DoD. However, the direction they provide has not been incorporated into permanent policy issuances to ensure the initiatives are enduring. DoDI 5025.01 mandates that a directive-type memorandum be incorporated into an existing DoD issuance, converted to a new issuance, or canceled or reissued within 12 months of the date signed.²⁸

The Military Departments are still in the process of implementing the guidance set forth in these memorandums. The September 2013 “Standardizing Facility Condition Assessments” memorandum states that the Military Departments have five years from its issuance to complete the baseline assessment for all facilities in inventory. OUSD(AT&L) stated that as of February 2016, the Navy and Marine Corps had completed a full baseline for its facility inventory, the Air Force had completed about half, and the Army had not yet reported completion of a significant portion of its baseline. The actions prescribed by the April 2014 “Facility Sustainment and Recapitalization Policy” memorandum are dependent upon completion of the facility condition assessments.

Conclusion

Improvements in policy and guidance made since 2010 have filled significant gaps. The policy and guidance establish:

- safety and habitability requirements for facilities used in support of military operations outside of the United States and in contingency locations,²⁹
- environmental policy applicable to contingency locations,³⁰ and

²⁸ DoDI 5025.01, “DoD Issuances Program,” June 6, 2014, Incorporating Change 1, October 17, 2014, states that directive-type memorandums should be used only for time-sensitive actions, must not be used to permanently change or supplement existing issuances, and are effective for no more than 12 months unless an extension is approved.

²⁹ DFARS Part 246.270, UFC 1-201-01, “Non-Permanent DoD Facilities in Support of Military Operations,” UFC 1-202-01, “Host Nation Facilities in Support of Military Operations,” and UFC 1-201-02, “Assessment of Existing Facilities for Use in Military Operations.”

³⁰ DoDI 4715.22, “Environmental Management Policy for Contingency Locations.”

- priorities for the reinvestment in facilities sustainment based on standardized condition assessments.³¹

These improvements, in combination with existing policy and guidance, provide well-defined health and safety requirements for facilities under DoD control.

We did not identify any significant gaps in electrical system safety, fire protection, environmental health and safety, and general building requirements. However, the USD(AT&L) should incorporate into permanent policy his memorandums that implement standardized facility inspections and prioritize the reinvestment in facilities sustainment.

Recommendations, Management Comments, and Our Response

Recommendation C

We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics establish permanent policy for the sustainment of facilities, including standardized facility inspections. This policy should incorporate the requirements set forth in the September 10, 2013, "Standardizing Facility Condition Assessments," and in the April 29, 2014, "Facility Sustainment and Recapitalization Policy," memorandums.

USD(AT&L) Comments

The Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment, responding for the USD(AT&L), agreed, stating that the two memorandums will be included in a new DoDI. The estimated publication date is FY 2017.

Our Response

Comments from the Principal Deputy addressed all specifics of the recommendation, and no further comments are required.

³¹ USD(AT&L) memorandums "Standardizing Facility Condition Assessments," September 10, 2013, and "Facility Sustainment and Recapitalization Policy," April 29, 2014.

Appendix A

Scope and Methodology

We conducted this evaluation from October 2015 through July 2016 in accordance with the “Quality Standards for Inspection and Evaluation,” published in January 2012 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the evaluation to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our evaluation objectives. We believe that the evidence obtained provides a reasonable basis for our findings, conclusions, and recommendations based on our evaluation objectives.

This report focused on the summary of recurring problems identified in six inspection reports related to the health and safety of DoD facilities and military housing, issued by DoD OIG from July 18, 2013, through July, 7, 2016. We evaluated common deficiencies and systemic issues as identified by these inspection reports to identify common issues and broader findings. We did not verify the accuracy of the documentation or analysis supporting the findings and conclusions in any of these inspection reports. We did not conduct any followup to ascertain the status of the deficiencies in each report.

We also reviewed audit reports issued by DoD OIG from June 30, 2011, through March 23, 2016, and identified eight reports pertaining to BOSS contracts and facilities maintenance. We did not validate the information or results stated in the audit reports summarized because these reports were already reviewed by the DoD OIG quality control process before they were issued. We reviewed the objectives, internal control weaknesses, criteria, findings, and open and closed recommendations contained in these reports and identified systemic problem areas. In addition, based on our review of the report findings and recommendations, we developed new recommendations.

Additionally, we analyzed relevant Federal laws and regulations and the applicability of consensus standards (as required by law or DoD policy). We also evaluated DoD policy and guidance related to health and safety requirements for facilities to identify any gaps, ambiguities, and conflicts in coverage for DoD-occupied facilities worldwide.

Use of Computer-Processed Data

We did not use computer-processed data to perform this evaluation.

Appendix B

Prior Coverage

During the last 7 years, the Department of Defense Inspector General issued 23 reports related to the health and safety of DoD facilities and military housing. Unrestricted DoD OIG reports can be accessed at <http://www.dodig.mil/pubs/index.cfm>.

DoD OIG

Report No. DODIG-2016-106, "U.S. Military-Occupied Facilities Inspection—King Abdullah II Special Operations Training Center," July 7, 2016

Report No. DODIG-2016-065, "U.S. Army Central and U.S. Army Contracting Command—Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center," March 23, 2016

Report No. DODIG-2015-181, "Continental United States Military Housing Inspections – Southeast," September 24, 2015

Report No. DODIG-2015-163, "Plans for Assessing Contractor Performance for the Camp Lemonnier Base Operations Support Contract Needed Improvement," August 27, 2015

Report No. DODIG-2015-162, "Continental United States Military Housing Inspections – National Capital Region," August 13, 2015

Report No. DODIG-2015-160, "U.S. Army Generally Designed Adequate Controls to Monitor Contractor Performance at the King Abdullah II Special Operations Training Center, but Additional Controls Are Needed," August 7, 2015

Report No. DODIG-2015-014, "Although U.S. Forces—Afghanistan Prepared Completion and Sustainment Plans for Ongoing Construction Projects for U.S. Facilities, Four Construction Projects at Bagram Faced Significant Challenges," November 5, 2014

Report No. DODIG-2015-013, "Military Housing Inspections – Republic of Korea," October 28, 2014

Report No. DODIG-2014-121, "Military Housing Inspections – Japan," September 30, 2014

Report No. DODIG-2014-093, "Inspection of the Armed Forces Retirement Home," July 23, 2014

Report No. DODIG-2014-074, "Navy Controls Over the Requirements Development Process for Military Construction Projects at Camp Lemonnier, Djibouti, Need Improvement," May 16, 2014

Report No. DODIG-2014-069, "Invoice Processes Administered in Accordance with DoD Guidance; However, Purchase Request Approvals Need Improvement and the Army Could Gain Efficiencies by Converting to a Firm-Fixed Price Contract," May 2, 2014

Report No. DODIG-2013-137, "DoD Is Not Properly Monitoring the Initiation of Maintenance for Facilities at Kandahar Airfield, Afghanistan," September 30, 2013

Report No. DODIG-2013-099, "Compliance with Electrical and Fire Protection Standards of U.S. Controlled and Occupied Facilities in Afghanistan," July 18, 2013

Report No. DODIG-2013-097, "Improvements Needed in the Oversight of the Medical-Support Services and Award-Fee Process Under the Camp As Sayliyah, Qatar, Base Operations Support Services Contract," June 26, 2013

Report No. DODIG-2013-052, "Inadequate Contract Oversight of Military Construction Projects in Afghanistan Resulted in Increased Hazards to Life and Safety of Coalition Forces," March 8, 2013

Report No. DODIG-2013-024, "U.S. Army Corps of Engineers Needs to Improve Contract Oversight of Military Construction Projects at Bagram Airfield, Afghanistan," November 26, 2012

Report No. DODIG-2012-089, "Better Contract Oversight Could Have Prevented Deficiencies in the Detention Facility in Parwan, Afghanistan," May 17, 2012

Report No. D-2011-078, "Contracts Supporting Base Operations in Kuwait Need Stronger Management and Administration," June 30, 2011

Report No. D-2010-084, "Military Family Housing on Okinawa, Japan," September 16, 2010

Report No. SPO-2009-005, "Assessment of Electrical Safety in Afghanistan," July 24, 2009

Report No. IPO2009E001, "Review of Electrocution Deaths in Iraq: Part II – Seventeen Incidents Apart from Staff Sergeant Ryan D. Maseth, U.S. Army," July 24, 2009

Report No. IE-2009-006, "Review of Electrocution Deaths in Iraq: Part I – Electrocution of Staff Sergeant Ryan D. Maseth, U.S. Army," July 24, 2009

Appendix C

Critical Deficiencies Identified During the Previous DoD OIG Inspections

The following sections provide additional details on the critical deficiencies identified in each of the previous six inspection reports.

Critical Deficiencies in Afghanistan

Report No. DODIG-2013-099, “Compliance with Electrical and Fire Protection Standards of U.S. Controlled and Occupied Facilities in Afghanistan,” July 18, 2013, identified 71 critical deficiencies at Kandahar Air Field and Bagram Air Field. These critical deficiencies were:

- 7 buildings with improperly grounded and bonded electrical systems (6 deficiencies);
- an inoperable automatic transfer switch for backup power at the Craig Joint Theater Hospital (1 deficiency);
- wiring and outlets with broken ground prongs and missing or defective GFCI protection (25 deficiencies);
- electrical system problems (10 deficiencies) including:
 - low-hanging overhead power conductors in the vicinity of roads,
 - missing disconnecting means for circuits,
 - improperly wired electrical outlets, and
 - unsafe use of extension cords and portable outlet strips.
- hazards and problems with fire protection systems (14 deficiencies) throughout building 156 at Kandahar Air Field, including a complete lack of the required fire alarm system, automatic fire suppression sprinkler system, and emergency lighting, as well as inadequate smoke detectors and live wires directly on roof (see Figure 2);
- an aircraft hangar containing sleeping quarters at Bagram Air Field that lacked the required fire alarm system, fire-rated walls, adequate smoke detectors, and proper means of egress (6 deficiencies); and
- problems with fire protection systems (9 deficiencies) including:
 - 1 building with an inoperable fire alarm system,
 - 2 buildings with inoperable or non-automatic fire suppression pump systems,
 - missing or improperly installed smoke detectors, and
 - unencapsulated flammable insulation in multiple buildings (see Figure 3).



Figure 2. Live wires directly on roof at Kandahar Air Field, Afghanistan.
(Deficiency No. KAF-EL-120426-084)
Source: Report No. DODIG-2013-099



Figure 3. Unencapsulated flammable insulation at Bagram Air Field, Afghanistan.
(Deficiency No. BAF-FP-120709-241)
Source: Report No. DODIG-2013-099

Critical Deficiencies in Japan

Report No. DODIG-2014-121, “Military Housing Inspections – Japan,” September 30, 2014, identified 145 critical deficiencies at 14 of the 15 installations inspected throughout Japan. The critical deficiencies were:

- 82 buildings at 12 of the 15 installations inspected did not have smoke alarms installed in sleeping areas (87 deficiencies);
- 6 buildings with improperly grounded and bonded electrical systems (6 deficiencies);
- electrocution and fire hazards due to miscellaneous electrical system problems (23 deficiencies) including:
 - broken electrical and lighting fixtures and exposed electrical wiring,
 - ungrounded building components,
 - reverse polarity wiring of electrical outlets, and
 - low-hanging power line service drops.
- problems with fire protection systems (18 deficiencies) including:
 - unreliable smoke detectors,
 - obstructed fire suppression sprinklers,
 - unmonitored and unsecured fire suppression sprinkler control valves, and
 - lack of fire-rated doors and separation of stairwells, laundry rooms, and other areas;



- a significantly deteriorated concrete building (see Figure 4) and a damaged and unsafe third-story exterior stair railing at another building (2 deficiencies); and
- unmitigated mold growth in multiple buildings and family housing units (9 deficiencies).

Critical Deficiencies in Korea

Report No. DODIG-2015-013, "Military Housing Inspections – Republic of Korea," October 28, 2014, identified 11 critical deficiencies at U.S. Army Garrison Yongsan, Camp Jackson, Camp Bonifas, Camp Stanley, and Camp Humphreys. These critical deficiencies were:

- 2 buildings with improperly grounded electrical systems (2 deficiencies, see Figure 5 for one example);
- 1 building with an inoperable fire alarm system (1 deficiency);
- buildings lacked the required carbon monoxide alarms where fossil fuel-burning equipment was installed (2 deficiencies);

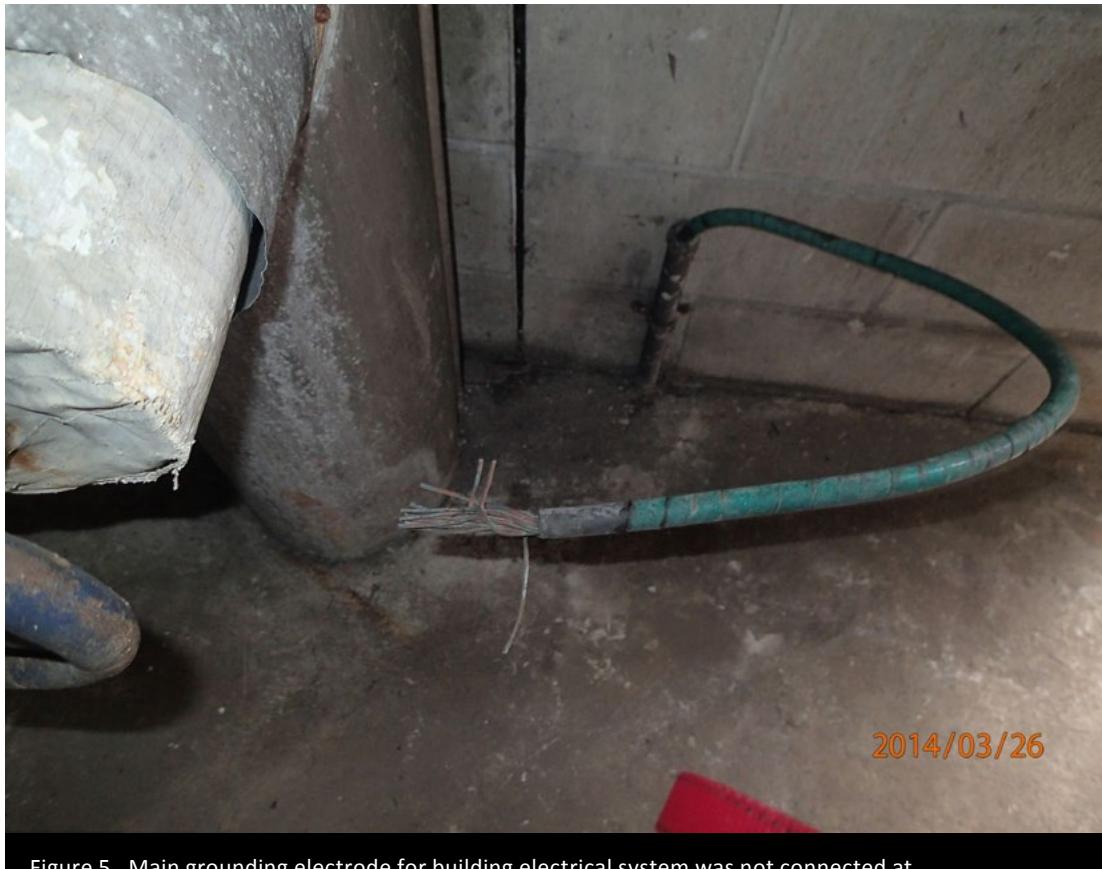


Figure 5. Main grounding electrode for building electrical system was not connected at Camp Jackson, Korea. (Deficiency No. JAC-EL-140326-006)
Source: Report No. DODIG-2015-013

- U.S. Army Garrison Humphreys personnel had not performed required monthly drinking water quality tests for about 8 months (1 deficiency); and
- electrocution and fire hazards (5 deficiencies) including:
 - ungrounded and improperly grounded building components,
 - exposed electrical wiring,
 - an improperly wired electrical panel, and
 - furnaces that were leaking oil.



Figure 6. Unmitigated mold growth at Osan Air Base, Korea (not included in NOC).
(Deficiency No. OSA-EN-140407-007)

Source: Report No. DODIG-2015-013

Critical Deficiencies in the Southeastern Region of the United States

Report No. DODIG-2015-181, “Continental United States Military Housing Inspections – Southeast,” September 24, 2015, identified 15 critical deficiencies at Naval Station Mayport, Florida, and Fort Gordon, Georgia. These critical deficiencies were:

- 1 building contained fire suppression sprinklers that were recalled in 2001 (1 deficiency) and
- 2 buildings had numerous fire protection deficiencies that collectively created an unsafe environment for occupants (13 deficiencies) including:
 - corridor and stairwell doors that were propped open or not fire rated,
 - compromised smoke separation between egress corridors and sleeping rooms,
 - problems with egress corridors and emergency lighting, and
 - missing fire extinguishers.

An additional critical deficiency reported in the DoD OIG NOC at Fort Gordon—an instance of suspected friable asbestos-containing material—was proven to be unsubstantiated by the Army after further investigation and testing.

Critical Deficiencies in Jordan

Report No. DODIG-2016-106, “U.S. Military-Occupied Facilities Inspection—King Abdullah II Special Operations Training Center,” July 7, 2016, identified 77 critical deficiencies. These critical deficiencies were:

- transient tents and 10 buildings with improperly grounded electrical systems (11 deficiencies);
- 3 instances of energized equipment enclosures and 5 buildings that contained ungrounded equipment (6 deficiencies);
- 3 buildings with compromised lightning protection systems (3 deficiencies);
- electrocution and fire hazards (22 deficiencies) including:
 - exposed electrical wiring,
 - improperly sized electrical conductors in electrical panels, and
 - inappropriate lighting fixtures used in wet and damp locations.
- buildings with inoperable or inadequate fire alarm systems (10 deficiencies);
- buildings that lacked required fire suppression sprinkler systems (9 deficiencies);
- obstructed fire hydrants (see Figure 7), buildings that lacked required fire hydrants, and buildings with obstructed fire department access (5 deficiencies);



Figure 7. Obstructed fire hydrant at KASOTC, Jordan. (Deficiency No. KAS-FP-150828-137)
Source: Report No. DODIG-2016-106



Figure 8. Building with no sprinklers that also lacked required fire-rated construction at KASOTC, Jordan.
(Deficiency No. KAS-FP-150828-134)

Source: Report No. DODIG-2016-106

- buildings with no sprinklers that also lacked required fire-rated construction and contained unencapsulated flammable insulation (7 deficiencies, see Figure 8 for one example); and
- A building lacked required fire-rated and self-closing doors and contained numerous improper locks on doors in the means of egress (4 deficiencies).

Management Comments

Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment Comments


OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
 3400 DEFENSE PENTAGON
 WASHINGTON, DC 20301-3400

SEP 02 2016

**ENERGY,
INSTALLATIONS,
AND ENVIRONMENT**

MEMORANDUM FOR DEPUTY INSPECTOR GENERAL FOR POLICY AND OVERSIGHT

THROUGH: DIRECTOR, ACQUISITION RESOURCES AND ANALYSIS *7/2/16*

SUBJECT: Response to DoD Office of the Inspector General Draft Report on Summary Report on Inspections of DoD Facilities and Military Housing (Project No. D2016-D000PT-0030.000)

As requested, I am providing responses to the general content and recommendations contained in the subject report.

Recommendation A.2: We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics establish a joint-Service working group that meets periodically to identify improvements in facility inspection and maintenance programs. The working group should, as a minimum, use the results from the independent inspections recommended in Recommendation A.1 and the results of the root cause analyses recommended in the previous DoD Office of Inspector General inspection reports to create and implement a plan for improvements in inspection and maintenance programs across DoD.

Response:
 Partially Concur. The Department already has such a working group in place. In his DoD policy memorandum, "Standardizing Facility Condition Assessments," issued in September 2013, the Under Secretary of Defense for Acquisition, Technology, and Logistics established the Sustainment Management System (SMS) Operations, Governance, and Configuration Support Panel (CSP). As stated in the CSP charter, the CSP provides program oversight, control, and responsibility for the SMS. The CSP reports to and takes direction from the DoD Energy, Installations, and Environment Functional Business Governance Board. Participation in the CSP is open to all DoD Components and other federal agencies that adopt SMS. This group has reviewed the previous DoD Office of Inspector General inspection reports to ensure that the items identified as deficiencies are inspectable items in the SMS tool used by DoD Components. The SMS tool will continuously be reviewed by the working group to ensure it remains relevant in a changing environment.

Recommendation B.1: We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics develop standard procedures or templates for each service that can be performed under Base Operations and Support Services contracts (for example, facility maintenance and life support functions) in contingency environments to assist DoD in the development and oversight of those contracts.

Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment Comments (cont'd)

- a. Identify minimum requirements to include in the performance work statement and minimum standards to measure those requirements in the quality assurance surveillance plans. Identify applicable Federal Acquisition Regulation clauses and DoD regulations that should be included in the contract.
- b. Identify minimum training that must be completed by personnel before overseeing Base Operations and Support Services contracts.
- c. Develop minimum requirements for a comprehensive risk assessment for each potential service performed under Base Operations and Support Services contracts that includes risk levels, timeframes for addressing each risk, and a mechanism to recover funds for services not completed.

Response:

- a. Partially Concur. Minimum requirements and clauses for performance work statements and minimum standards to measure those requirements in the quality assurance surveillance plan are adequately described in FAR 11.2/DFARS 211.2, Describing Agency Needs, and FAR 37.6/DFARS237.6, Performance-Based Acquisition. Responsibility for identifying specific requirements, such as quantities and standards, are the responsibility of the Military Departments, not the Under Secretary of Defense for Acquisition, Technology, and Logistics.
- b. Partially Concur. Minimum training requirements are identified in the DoD Contracting Officer's Representative (COR) Handbook in Appendix C (http://www.acq.osd.mil/dpap/cpic/cp/docs/USA001390-12_DoD_COR_Handbook_Signed.pdf).
- c. Non-Concur. It is inappropriate to establish a comprehensive set of risk factors for Military Departments given the variability of the factors that can affect risk. The Department relies on the Military Departments to define risk using their own judgement of requirements, potential impact to mission, life, safety, health, and conditions on the ground. The OSD Comptroller and its subordinate organizations have procedures for recovering funds for services not provided/completed via contracts.

Recommendation C: We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics establish permanent policy for the sustainment of facilities, including standardized facility inspections. This policy should incorporate the requirements set forth in the September 10, 2013, "Standardizing Facility Condition Assessments," and in the April 29, 2014, "Facility Sustainment and Recapitalization Policy," memorandums.

Response:

Concur. The facility policies established by the Under Secretary of Defense for Acquisition, Technology and Logistics memorandums, "Standardizing Facility Condition Assessments," and "Facility Sustainment and Recapitalization Policy" will be included in a new DoD Instruction which is being drafted for estimated publication in Fiscal Year 2017.

Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment Comments (cont'd)

Please contact [REDACTED] if
additional information is required.

for 

Peter Potochny
Principal Deputy Assistant Secretary of Defense
(Energy, Installations, and Environment)
Performing the Duties of the Assistant Secretary of Defense
(Energy, Installations, and Environment)

Assistant Secretary of the Army for Installations, Energy, and Environment Comments



DEPARTMENT OF THE ARMY
ASSISTANT SECRETARY OF THE ARMY
INSTALLATIONS, ENERGY AND ENVIRONMENT
110 ARMY PENTAGON
WASHINGTON DC 20310-0110

SAIE

12 Aug 16

MEMORANDUM FOR Department of Defense, Inspector General (ATTN: Deputy Inspector General, Policy and Oversight), 4800 Mark Center Drive, Alexandria, Virginia 22350-1500

SUBJECT: Army Position on DODIG Draft Summary Report – Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts, Project No. D2016-D000PT-0030.000

1. The Army's installation management community is greatly appreciative of the DODIG's efforts to ensure safe, quality facilities and living conditions are provided to our military personnel world-wide.
2. The Army concurs with the recommendation A.1 in the subject DODIG draft report to annually inspect two Army installations in order to verify compliance with applicable health and safety requirements and to aid DoD in improving facility sustainment worldwide. We will develop a plan in the next 180 days to implement the recommendation.
3. The POC for this action is [REDACTED]

KATHERINE HAMMACK

CF:
ACSIM
IMCOM

Principal Deputy Assistant Secretary of the Navy for Energy, Installations, and Environment Comments



DEPARTMENT OF THE NAVY
OFFICE OF THE ASSISTANT SECRETARY
(ENERGY, INSTALLATIONS AND ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON DC 20350-1000

AUG 08 2016

MEMORANDUM FOR THE INSPECTOR GENERAL, DEPARTMENT OF DEFENSE

SUBJECT: Summary Report on Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts (Project No. D2016-D000PT-0030.000)

Department of the Navy comments on the subject draft report are attached. Thank you for the opportunity to comment on the subject draft report. My point of contact is
[REDACTED]

Steven Iselin
Principal Deputy

Attachments
As stated

cc:
NAVINSGEN
CNIC
MCICOM
NAVFAC

Principal Deputy Assistant Secretary of the Navy for Energy, Installations, and Environment Comments (cont'd)

SUMMARY REPORT ON INSPECTIONS OF DOD FACILITIES AND MILITARY HOUSING AND AUDITS OF BASE OPERATIONS AND SUPPORT SERVICES CONTRACTS (PROJECT NO. D2016-D0000PT-0030.000)

The Department of the Navy's responses to the findings and recommendations of the Department of Defense Inspector General's (DoD IG's) subject Draft Report are provided below.

Recommendation A.1: That the Secretaries of the Military Departments annually perform at least two comprehensive, independent inspections of installations. The purpose of these inspections is to verify compliance with all applicable health and safety requirements.

Response: Concur.

Our concurrence is based on the understanding that the DoD IG is recommending that each Military Department conduct independent health and safety inspections for at least two military installations per year. This understanding is based on the discussion contained in page 9 of the draft report.

The Office of the Assistant Secretary of the Navy (Energy, Installations & Environment) will work with appropriate Navy and Marine Corps offices, to include the Naval Inspector General, to develop guidance for the conduct of such inspections. We estimate the issuance of such guidance by 31 October 2016.

Deputy to the Commanding General, U.S. Army Materiel Command Comments



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY CONTRACTING COMMAND
4505 MARTIN ROAD
REDSTONE ARSENAL, AL 35898-5000

AMCCC-IG

MEMORANDUM THRU

Commander, U.S. Army Materiel Command (AMCCG), 4400 Martin Road, Redstone Arsenal, AL 35898-5000

FOR Inspector General, Department of Defense, 4800 Mark Center Drive, Alexandria, VA 22350-1500

SUBJECT: Inspector General, Department of Defense, "Summary Report on Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts" D1638 (Project No. D2016-D000PT-0030.000)

1. Subject report dated 25 July 2016, identified the objective, findings, and recommendations associated with this evaluation, and requested Army Contracting Command-Rock Island comments.
2. HQ Army Contracting Command comments are contained at Enclosure 1.
3. My action officer is [REDACTED]

Encl

JOHN M. LYLE
Deputy to the Commanding General

Deputy to the Commanding General, U.S. Army Materiel Command Comments (cont'd)

Recommendation B.2

We recommend that the Army Contracting Command-Rock Island, in coordination with the requiring activity for Base Operations and Support Services contracts awarded in a contingency environment:

- a. Revalidate contract requirements before exercising the next option year and revise as needed to ensure the contract requirements align with changes in mission requirements in contingency environments.

HQ ACC/Command RESPONSE: CONCUR subject to the following: Although the Contracting Officer validates requirements prior to exercising the option, it is the requiring activity's responsibility to revalidate the PWS and QASP in a timely fashion prior to providing to Contracting Officers. The CENTCOM Operations Contracting Support Integration Cell is working initiatives to facilitate timely requirement document submissions. The Contracting Officer will ensure the contract incorporates these changes when exercising options, when allowable under applicable statute and regulation.

- b. Revise quality assurance surveillance plans to ensure oversight methods remain consistent with services added or deleted during the requirements revalidation process described in Recommendation 8.2.a.

HQ ACC/Command RESPONSE: CONCUR subject to the following: The Contracting Officer will check with the Requiring Activity to find out if they have revised the QASP to reflect changes to ensure oversight methods remain consistent with services added or deleted during the requirements revalidation process. Any revisions to the QASP allowable under applicable statute and regulation will result in contract modification.

Principal Director, Built Infrastructure Policy and Programs, Office of the Deputy Assistant Secretary of the Air Force for Environment, Safety, and Infrastructure Comments



DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

OFFICE OF THE ASSISTANT SECRETARY

AUG 24 2016

MEMORANDUM FOR DoD IG

FROM: SAF/IEE
1665 Air Force Pentagon
Washington, DC 20330-1665

SUBJECT: DoD IG Summary Report – Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts (Project No. D2016-D000PT-0030.000)

Air Force has reviewed the subject draft DoD IG report and concurs without comment in the attached document.

If you or a member of your staff has any questions, please contact [REDACTED]

A handwritten signature in black ink, appearing to read "Lee A. Conesa".

LEE A. CONESA, GS-15
SAF/IEE Principal Director, Built Infrastructure
(Environment, Safety, and Infrastructure)

Attachment:

1. Air Force Recommendation Summary

Principal Director, Built Infrastructure Policy and Programs, Office of the Deputy Assistant Secretary of the Air Force for Environment, Safety, and Infrastructure Comments (cont'd)

**DoD IG DRAFT SUMMARY REPORT DATED JULY 25, 2016
(PROJECT NO. D2016-D000PT-0030.000)**

"INSPECTIONS OF DoD FACILITIES AND MILITARY HOUSING AND AUDITS OF BASE OPERATIONS AND SUPPORT SERVICES CONTRACTS"

AIR FORCE COMMENTS TO THE DoD IG RECOMMENDATION

RECOMMENDATION A.1: We recommend that the Secretaries of the Military Departments annually perform at least two comprehensive, independent inspections of installations. The purpose of these inspections is to verify compliance with all applicable health and safety requirements.

AIR FORCE RESPONSE: Concur without comment.

Acronyms and Abbreviations

ACC-RI	Army Contracting Command—Rock Island
ARCENT	U.S. Army Central
ASD(EI&E)	Assistant Secretary of Defense for Energy, Installations, and Environment
BOSS	Base Operations and Support Services
CONUS	Continental United States
COR	Contracting Officer's Representative
DFARS	Defense Federal Acquisition Regulation Supplement
DoD OIG	Department of Defense Office of Inspector General
FAR	Federal Acquisition Regulation
GFCI	Ground-Fault Circuit Interrupter
KASOTC	King Abdullah II Special Operations Training Center
NCR	National Capital Region
NOC	Notice Of Concern
OCONUS	Outside Continental United States
OEBGD	Overseas Environmental Baseline Guidance Document
OUSD(AT&L)	Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics
PWS	Performance Work Statement
QASP	Quality Assurance Surveillance Plan
SMS	Sustainment Management System
UFC	Unified Facilities Criteria
USCENTCOM	U.S. Central Command
USD(AT&L)	Under Secretary of Defense for Acquisition, Technology, and Logistics



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U.S. DEPARTMENT OF DEFENSE

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For more information about DoD IG reports or activities, please contact us:

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